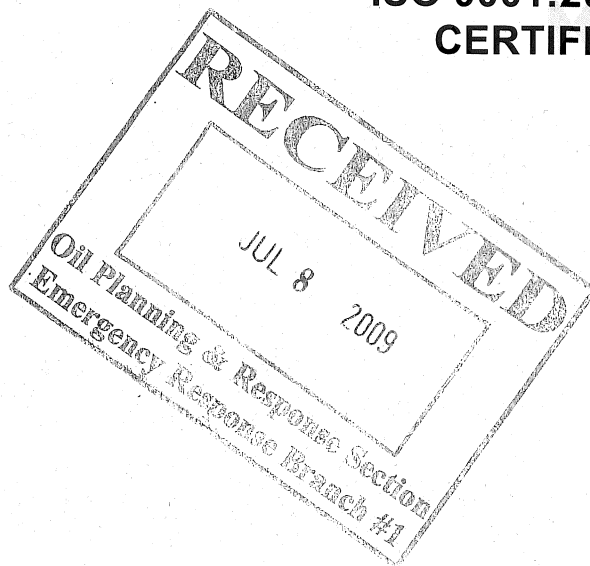


**ISO 9001:2000
CERTIFIED**

July 6, 2009

U.S. Environmental Protection Agency
Attn: Dr. Shitien Yang, SPCC Inspector Grantee
Emergency Response Branch (SE-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Reference: SPCC Audit
SE-5J/OPRS-SPCC
09-3-043



Dear Mr. Yang:

This letter is our 30 day follow-up response on the Region V SPCC audit findings conducted on April 29, 2009. We received your letter June 12, 2009 of which a 30 day response is required outlying abatement for plan deficiencies. Lube-Tech will take prompt action to resolve the plan deficiencies. The following is our game plan to update our SPCC plan to correct the deficiencies noted during your audit.

1. 40 C.F.R. Part 112.7 General requirements for Spill Prevention, Control and Countermeasure Plans.

(a) (3) Failure to describe in your plan, the physical layout of the facility including a facility diagram with contents and locations of each container, locations of transfer stations and connecting piping, and all completely buried tanks that are otherwise exempted from this Part.

Plan of Action: Lube-Tech will determine the amount, locations of drums, mobile bulk storage containers (totes) with the facility and railcar transfer area and update the written SPCC for the certifying engineer, Martin Bonnell PE.

2. (c) Failure to provide appropriate secondary containment and /or diversionary structures or equipment to prevent a discharge.

Plan of Action: Lube-Tech through Martin Bonnell PE will develop a general containment plan that will accommodate railroad transfer spills. Martin Bonnell's plan of action is as follows.

- A. Review the railcar transfer area for secondary containment or other options.

- B. Prepare recommendations to bring the railcar transfer are into full compliance with current SPCC rules as required.
- C. Inspect the railcar secondary containment area after construction.
- D. Review the SPCC Plan, make any recommendations to the SPCC Plan and certify the Plan.

3. 40 C.F.R. Part 112.8 General requirements for Spill Prevention, Control and Countermeasure Plans for onshore facilities (excluding production facilities).

(c) (11) Failure to position or locate portable or mobile oil storage container so to prevent discharge.

Plan of Action: Lube-Tech will identify all portable and mobile containers locations such as drums and totes storage at the facility to determine containment methods. This will be updated in the written plan.

Our time frame to complete the three recommendations is targeted for December 1, 2009. The time frame was coordinated with Martin Bonnell. We will provide two month update on our progress. We will be working closely with Martin Bonnell PE to ensure we comply with the SPCC requirements. If our **Plan of Action** is felt to be unreasonable please let us know for revision.

Should you have any questions, please contact me at your convenience via email (ScottBergm@Lube-Tech.com), letter or phone.

Sincerely,

Scott Bergman
Facility and Project Manager